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Attorney for: Michael CORSBIE, Jr.

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,)	Case No: 2:11-cr-00036 WBS
)	
Plaintiff,)	STIPULATION AND [PROPOSED]
)	ORDER TO CONTINUE STATUS
v.)	CONFERENCE
)	
Michael CORSBIE, Jr.)	
)	
Defendants.)	

The defendant, Michael Corsbie, Jr. through his undersigned counsel, and the United States, through its undersigned counsel, hereby agree and request the Status Conference currently set for Monday, May 23, 2011 at 8:30 am be vacated and continued until Tuesday, May 31, 2011 at 8:30 am.

1 A continuance is necessary to provide counsel with additional time for
2 ongoing plea and sentencing negotiations.

3 The parties also stipulate that time should be excluded under the Speedy
4 Trial Act due to the needs of counsel for continued case preparation and ongoing
5 plea and sentencing negotiations. Local Code T4 & 18 U.S.C § 3161 (h)(7)(B)(iv).
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8 I, William E. Bonham, the filing party, have received authorization from
9 AUSA William Wong to sign and submit this stipulation and proposed order on his
10 behalf.
11

12 Accordingly, the defense and the United States agree and stipulate that the
13 Status Conference for defendant Michael Corsbie, Jr. should be continued until
14 Tuesday, May 31, 2011 at 8:30 am. The parties stipulate that the ends of justice
15 served by granting this continuance outweigh the best interests of the public and
16 defendant in a Speedy Trial. 18 U.S.C. § 3161(h)(7)(A).
17
18

19 Dated: May 20, 2011

20 BENJAMIN B. WAGNER
21 United States Attorney

22 By: /s/ WILLIAM E. BONHAM for
23 WILLIAM WONG
24 Assistant U.S. Attorney
25
26

27 Dated: May 20, 2011
28

By: /s/ WILLIAM E. BONHAM for
WILLIAM E. BONHAM
Counsel for Defendant
Michael CORSBIE

ORDER

IT IS SO ORDERED THAT THE Status Conference for defendant, Michael Corsbie, Jr. currently set for Monday, May 23, 2011 at 8:30 am should be vacated and continued to Tuesday, May 31, 2011 at 8:30 am.

The court finds that the continuance is necessary due to the needs of counsel for continued case preparation and plea/sentencing negotiations. Accordingly, time is excluded under the Speedy Trial Act, due to needs of counsel for additional case preparation and ongoing plea/ sentencing negotiations, from May 23, 2011 up to and including May 31, 2011 pursuant to Local Code T4 and 18 U.S.C. § 3161(h)(7)(B)(iv). The court finds that the ends of justice served by granting this continuance outweigh the interest of the public and defendant in a speedy trial. 18 U.S.C. § 3161(h) (7)(A).

Dated: May 20, 2011



WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE